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December 14, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
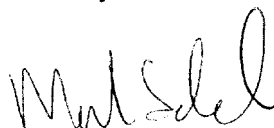Room TW-B-204
Washington, DC 20554

> Re: Application of Bell Atlantic Pursuant to Section 271 of the
> Telecommunications Act of 1996 to Provide In-region, InterLATA
> Services in New York, CC Docket No. 99-295

Dear Ms. Salas:

Please find enclosed the Comments of MCI WorldCom, Inc. on the Post-Application Evidence Relating to the Section 271 Application by Bell Atlantic-New York, filed as an ex parte in accordance with the Commission's December 3, 1999 request for interested parties to respond to supplemental evidence in the Bell Atlantic section 271 proceeding.

Pursuant to this Commission's order, MCI WorldCom is filing a confidential portion of its submission and a redacted version of its entire submission. Inquiries regarding access to the confidential information by other participants in this proceeding (subject to the terms of the applicable protective order) should be addressed to: Elena Broder-Feldman, Jenner & Block, 601 13th Street, NW, Suite 1200, Washington, DC 20005, (202) 637-6310.

Sincerely,

Mark D. Schneider

Enclosure

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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Application by New York Telephone	)	
Company (d/b/a Bell Atlantic -	)	
New York), Bell Atlantic	)	Docket No. 99-295
Communications, Inc., NYNEX Long	)	
Distance Company, and Bell Atlantic	)	
Global Networks, Inc., for	)	
Authorization To Provide In-Region,	)	
InterLATA Services in New York	)	

COMMENTS OF MCI WORLDCOM, INC.
ON THE POST-APPLICATION EVIDENCE RELATING TO THE
SECTION 271 APPLICATION BY BELL ATLANTIC-NEW YORK

MCI WorldCom, Inc. hereby responds to the Commission's request that participants in

this proceeding address the supplemental evidence recently filed by Bell Atlantic-New York

("BA-NY") and the New York State Public Service Commission ("NYPSC"). While that new

evidence shows improvement in some areas, frequently it merely corroborates what the previous

evidence submitted with BA-NY's application proved: that BA-NY still needs to take additional

steps before its application can be granted. BA-NY's application was filed prematurely in

September, and the newly submitted evidence shows that it would have been premature even if it

had been filed in late November.

In what follows, MCI WorldCom will address the new evidence relevant to the factual

issues included in its Comments and Reply Comments concerning BA-NY's Operations Support

Systems ("OSS") and the performance measurement system in New York.

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A. OSS

1. Pre-Ordering

In its reply comments, BA-NY claims that it processed more than 283,000 pre-ordering transactions in October. BA-NY Reply Comments, Miller, Jordan & Zanfini Reply Decl. ¶ 5. What BA-NY does not say is that CLECs continue to struggle with BA-NY's new GUI III interface for pre-ordering. While MCI WorldCom today uses the EDI interface for retrieving customer service records ("CSRs") and address validation, we still must rely on the GUI for key pre-ordering subfunctions, like telephone number reservation and due date availability. In this relation, MCI WorldCom has experienced problems with BA-NY's GUI III interface and its internet connection and, as a result, has asked BA-NY to postpone decommissioning the GUI II until the GUI III is able to function without significant problems for a minimum of seven working days.

Since MCI WorldCom raised the issue in its Reply Comments, at 15-17, BA-NY has addressed some of the deficiencies with the interface, but significant problems remain. MCI WorldCom is now satisfied with the overall functionality of the GUI III, but our representatives continue to have difficulty with the internet connection to BA-NY, and long response times are still a problem. Despite these continuing difficulties, BA-NY has not definitively agreed to extend operations for the GUI II beyond December 18, 1999. MCI WorldCom and BA-NY have scheduled a conference call for Friday, December 17, to further discuss the open issues.

2. Ordering and Provisioning

BA-NY claims in its reply comments to have processed more than 177,000 ordering transactions in October. BA-NY Reply Comments, Miller, Jordan & Zanfini Reply Decl. ¶ 5.

BA-NY fails to mention that (a) its wholesale flow-through rates are still too low and (b) the

backlog of missing firm order confirmations ("FOCs") and notices of completion ("NOCs") has

not been resolved and continues to increase.

a. Wholesale Flow-Through Rates Remain Unacceptably Low

BA-NY makes much of the BA-NY Carrier-to-Carrier Report for October 1999, but that

report shows that BA-NY's wholesale flow-through rates, even for basic UNE-platform orders,

continue to be inadequate. The data shows that BA-NY provided automated, flow-through

processing for only **REDACTED** of MCI WorldCom's UNE-platform orders in October,

down from **REDACTED** in September. The data further shows that the flow-through rate

for CLECs generally was even lower, at around 61%.[1]

BA-NY has promised to increase flow-through for CLEC orders significantly in the

future, but BA-NY has not yet made all the necessary enhancements. Moreover, there have been

problems with BA-NY's implementation of the first phase of flow-through enhancements, which

only highlights the importance of withholding judgment on promised improvements until they

have been proven reliable in actual commercial use. Of the enhancements introduced on October

30, three were particularly important to MCI WorldCom: (1) automatic rejection of orders with

inaccurate customer listed addresses; (2) flow-through for orders whether or not hyphens are used

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[1]   BA-NY Carrier-to-Carrier Report for October 1999, CLEC Aggregate Performance, Ordering - UNE POTS/Special Services – Aggregate, Percent Flow-Through Metrics OR-5-01 (% Flow-Through - Total) (60.32%), OR-5-02 (% Flow-Through - Simple) (61.46%).

Similarly, a recent analysis by the New York Department of Public Service ("NYDPS") shows that the flow-through rates for CLEC UNE orders (including both UNE-loop and UNE-platform orders) has remained relatively constant at around 55% from March through September 1999. Ex Parte from P. Rubin, New York Department of Public Service, CC Docket No. 96-98 (Dec. 7, 1999).

in the local contact telephone number; and (3) flow-through for orders with company blocking on the customer accounts. See MCI WorldCom Comments, Lichtenberg & Sivori Decl. ¶¶ 105-112. Of these changes, two have proven problematic, and the efficacy of the third remains to be seen.

First, as part of its October 30 enhancements, BA-NY was to begin automatically rejecting orders if the listed address on the order did not precisely match the address in BA-NY's records. BA-NY had been dropping many such orders out of the automated order flow for manual processing. BA-NY postponed implementing this enhancement because it failed to provide any mechanism for the CLECs either to change or to correct the existing listed address on the CSR during the ordering process.

Second, BA-NY was also to begin providing flow-through processing for orders regardless of whether they included hyphens in the local contact telephone number ("LCON TN" field). Despite BA-NY's agreement in the OSS collaboratives that hyphens would not be required for any field, BA-NY had been rejecting orders without hyphens in this field. Unfortunately, when BA-NY implemented the change, it also began rejecting all orders where the local contact number was the same as the new telephone number (known as the "account telephone number" or "ATN"). This is problematic both because BA-NY promised that its enhancement would not change the way in which it processed orders (and previously such orders were processed manually, not rejected) and because the requirement that the local contact number differ from the account number does not appear in BA-NY's business rules.

Third, BA-NY implemented flow-through processing for orders with BA-NY company blocking on customer accounts. In contrast to the October changes discussed above, there have been no immediate difficulties with this flow-through enhancement, but neither is there sufficient

-4-

evidence to conclude that the change will ultimately prove successful. The preliminary data for the first ten days in November suggests that these improvements have increased flow-through, but this data is fragmentary and inherently unreliable because it covers only a short period and was produced without the assurances that are built in to the official carrier-to carrier performance reports. MCI WorldCom looks forward to the November carrier-to-carrier report, which is scheduled to be released on December 27, 1999, for confirmation that BA-NY's October enhancements had their intended effect.

In addition to the October modifications, BA-NY has promised more improvements on December 18, 1999, and a final enhancement before June 2000. See MCI WorldCom Comments at 13, Lichtenberg & Sivori Decl. ¶ 107. These changes have not been implemented, but MCI WorldCom remains hopeful that they will perform as advertised and bring flow through to an appropriate level.

Also in its reply, BA-NY for the first time provides an estimated flow-through rate for retail orders: BA-NY contends that, on one internal measure, only a little over 60% of its retail orders could be said to flow through. BA-NY Reply Comments at 18 n.20. It is not clear, however, how BA-NY intends for the Commission to use this new information. BA-NY plays down the importance of the figure by referring to it only in passing in a footnote and by saying that it "misses the point." Id. In its recent opposition to AT&T's motion to strike the analysis, BA-NY reiterates its view that "there is no close retail analog in Bell Atlantic's systems to the flow through of CLEC orders" and refers to its new measure as "the next closest retail surrogate." BA-NY's Opposition to AT&T's Motion to Strike at 7. On the other hand, BA-NY compares its 60% figure with the 95% to 100% flow-through rates sought by the CLECs and

notes that its figure compares favorably to current wholesale rates. BA-NY Reply Comments, Miller, Jordan & Zanfini Reply Decl. ¶ 39.

However BA-NY intended its surrogate retail flow-through measure to be used, the Commission plainly should not adopt it as the flow-through standard for CLECs. First, BA-NY's vague descriptions of its new measure raise more questions that they answer. BA-NY defines a retail flow-through order for the purpose of its analysis as an order that a BA-NY sales representative could enter using its Direct Order Entry ("DOE") system. BA-NY Application, Miller & Jordan Decl. ¶ 57.[2] BA-NY explains that the DOE is a front-end application or interface that simplifies order entry into the Service Order Processor ("SOP"), which ultimately processes the orders. Id. We are further told that "simple retail orders" can be inputted through DOE and that "more complex retail orders" must be taken down on paper and later entered by the sales representative directly into the SOP. BA-NY's Opposition to AT&T's Motion to Strike at 7 n.8.

Assuming the accuracy of BA-NY's description, BA-NY does not identify the order types, features, and conditions that require manual processing at the retail level, or show how these orders compare with flow-through orders at wholesale. BA-NY does not even say how

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[2]   BA-NY also used DOE order entry as the retail analog in its initial application for the purposes of a high level comparison of retail and wholesale flow-through order types. See BA-NY Application, Miller & Jordan Decl. ¶ 57. As MCI WorldCom has explained, that analysis is fundamentally flawed both because it relies on the analogy with DOE ordering and because it compares retail and wholesale ordering at too high a level of abstraction. See MCI WorldCom Comments, Lichtenberg & Sivori Decl. ¶ 112. As MCI WorldCom has explained, a large share of BA-NY's flow-through problems lie in the conditions BA-NY places on flow-through orders (such as whether there is company blocking on the customer's account or whether the account has multiple listings), not on the order types that flow through (such as migrations, new orders, moves, adds, changes, and deletes). Id.

many of the orders are business orders and how many are residential orders or explain why

certain orders are handled through DOE and others are not. BA-NY also does not describe in any

detail how manual orders are handled for retail as compared to manual processing for wholesale.

BA-NY's conclusion is based instead on a series of unstated assumptions that have never been

shared with CLECs, the Department of Justice, the NYPSC, KPMG, or any other neutral party.

Second, until BA-NY's reply filing in these proceedings, no ILEC (including BA-NY)

has ever claimed such a low flow-through rate for its retail services. In South Carolina, for

example, BellSouth reported 97% flow-through for retail residential orders and 81% for business

orders. BellSouth South Carolina Order ¶ 104. In Louisiana, BellSouth reported a 96% flow-

through rate for residential orders and a 82% rate for business orders. Second BellSouth

Louisiana Order ¶ 109. And, even in New York, BA-NY has promised to make modifications to

its systems that are supposed to provide up to 90% flow-through at wholesale. NYPSC Eval. at

47.

Third, leaving aside the questions whether the Commission should abandon its "complete

when filed" rule in this proceeding and whether BA-NY's reply submission violates that rule,[3/]

the timing of BA-NY's submission raises questions about its reliability. Flow-through order

processing is a basic business requirement for CLECs and has been a central issue in the New

York 271 proceedings since BA-NY first claimed that it was providing CLECs with adequate

access to OSS in early 1997. If BA-NY seriously believed that its retail flow-through rates could

legitimately be as low as 60%, it would have pressed the argument in the proceedings in New

York--in the OSS Collaboratives, in the NYPSC technical conferences, and certainly during the

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3/   See AT&T Motion to Strike at 2-9.

NYPSC Staff's recent investigation of BA-NY's flow-through problems. BA-NY also would have highlighted this point for the Commission in its initial application. Instead, BA-NY raises the issue at the eleventh hour, in a footnote, in its reply comments.

Under these circumstances, BA-NY's proposed retail analog lacks sufficient credibility and reliability to be given any probative weight. It appears, instead, to be little more than a rhetorical effort to defend BA-NY's earlier failure to produce a realistic and defensible retail analog in its application, and should be disregarded.

b. The Backlog of Missing FOCs and NOCs Has Not Been Resolved and Continues to Grow

In its reply comments, MCI WorldCom reported that BA-NY was again struggling to provide firm order confirmations ("FOCs") and notices of completion ("NOCs") and that, in fact, MCI WorldCom was missing status notices for thousands of its UNE-platform orders. At that time, there was a backlog of 1143 FOCs and 9821 NOCs left unaccounted for. MCI WorldCom Reply Comments at 10; Lichtenberg & Sivori Supp. Decl. ¶ 19. Today the problem is worse. As of December 3, 1999, MCI WorldCom still had not received FOCs for 2963 orders or NOCs for 15,577 orders. After more than two months of working to resolve this backlog, many of these orders still date from August 1999.

Without a FOC, MCI WorldCom cannot confirm a customer's scheduled due date for service. MCI WorldCom Reply Comments at 10; Lichtenberg & Sivori Supp. Decl. ¶ 18. And, until MCI WorldCom receives a NOC indicating that a customer's order has cleared BA-NY's billing systems (known as a billing completion notice or "BCN"), MCI WorldCom cannot begin billing that customer without a likelihood of double billing, even though the customer is MCI

WorldCom's. MCI WorldCom Reply Comments at 10; Lichtenberg & Sivori Supp. Decl. ¶¶ 18,

20. As a result, until BA-NY returns a NOC, the customer remains unaware that it is actually

receiving MCI WorldCom service, and is not aware that it has available the features and

functions it has purchased from MCI WorldCom. And when MCI WorldCom finally is able to

bill the customer, if the NOC is delayed, the bill might have to include more than one month's

service. That is no way to start a relationship with a new local customer.

MCI WorldCom continues to work with BA-NY to try to resolve the backlog of orders

and to address the underlying problem so that MCI WorldCom's orders going forward will not be

lost. Unfortunately, despite weeks of work, the backlog of lost orders is increasing, not

decreasing, and MCI WorldCom has not seen any improvement in BA-NY's ability to provide

these basic status notices on a day-to-day basis. The root cause or causes of these problems must

be identified and permanently fixed, but MCI WorldCom's most immediate concern is the

backlog of old orders. MCI WorldCom has asked that, by January 1, 2000, BA-NY at least have

cleared all orders sent before December 1, 1999.

MCI WorldCom has also become concerned with the growing number of orders for

which BA-NY fails even to provide the initial electronic acknowledgment (known as a "997").

The 997 is a simple electronic response or "ping" that BA-NY is supposed to return to a CLEC

automatically upon receiving an order. Receiving a 997 is a necessary initial step in placing an

order. It is then followed by the FOC and later a NOC as the order is processed. In one week

(November 29 to December 3), MCI WorldCom reported that BA-NY failed to provide 997

responses within two hours for more than 17,000 UNE-platform orders. MCI WorldCom has

been opening trouble tickets daily, and, as of December 3, we had trouble tickets open on more than 32,000 orders without acknowledgments.

BA-NY's approach has been to address the problem on an order-by-order basis. BA-NY investigates each order and tells MCI WorldCom whether or not MCI WorldCom must resend it. BA-NY continues to look at several possible causes for the problems with its hardware and software, but has not yet provided a root cause analysis for the missing acknowledgments. BA-NY has also begun providing a daily report of orders received. Unfortunately, the reports do not match MCI WorldCom's records of orders and acknowledgments, so BA-NY has agreed to hold a daily call with MCI WorldCom to review the reports and resolve the discrepancies.

In sum, BA-NY correctly reports that CLEC order volumes are increasing. It omits the fact that its difficulties in processing those orders is increasing as well. These are problems that must be resolved in advance of BA-NY's entry into its interLATA market.

3. Change Management

BA-NY also provides a one-sided discussion of recent developments in change management. BA-NY correctly reports that CLECs and BA-NY have been meeting to discuss BA-NY's new proposed procedures for emergency changes and outages (known as Type 1/Severity 1 changes). Miller, Jordan & Zanfini Reply Decl. ¶ 70. It correctly states that it distributed the modified final documentation for change management notifications on October 25, 1999, and that further discussions were scheduled for November 9, 1999. BA-NY also has agreed, as it says, to hold additional change management workshops with CLECs on the definition of Type 1/Severity 1 changes. Id.

Problems persist in this area, however.[4] For instance, BA-NY's proposal for change management notifications still allows BA-NY to close trouble tickets without providing a root cause analysis of the underlying problem. For each trouble ticket, MCI WorldCom should receive a complete explanation of what BA-NY has determined the problem to be and how BA-NY has resolved it. Without this basic information, MCI WorldCom cannot take the steps necessary to ensure that the difficulties do not resurface. The recurrence of the problems with the backlog of missing FOCs and NOCs is a troubling example of what happens when BA-NY does not provide root cause analysis. See MCI WorldCom Reply Comments at 14; Lichtenberg & Sivori Supp. Decl. ¶¶ 23, 34. Had BA-NY provided its analysis of the problem the first time it arose, MCI WorldCom could have helped BA-NY see that it was addressed so that it would not be repeated. Instead, BA-NY evidently instituted only a short-term fix, and MCI WorldCom now faces the same problem again. This approach is unacceptable, and MCI WorldCom continues to encourage BA-NY to modify its change management rules and practices to satisfy this basic need.

In addition, in its reply comments, BA-NY promises to address the problems with its help desks by implementing "a new trouble reporting system" that will be designed to improve its internal escalation and referral procedures and reduce response times. BA-NY Reply Comments, Miller, Jordan & Zanfini Reply Decl. ¶ 98. BA-NY also says that it will increase help desk staffing "if needed." Id. MCI WorldCom is glad that BA-NY is beginning to take the problems with its help desk service more seriously, but BA-NY does not provide any of the details of its

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[4] In accordance with the schedule agreed upon by BA-NY and the CLEC community, MCI WorldCom submitted comments on the October 25 draft rules yesterday, December 13, 1999. See Attachment 1.

new procedures, and the plan has apparently not yet been implemented. MCI WorldCom cannot comment meaningfully on BA-NY's proposal, and it can hardly serve as a basis for a conclusion that BA-NY has satisfied its checklist obligation to provide working OSS.

BA-NY's promises to one side, MCI WorldCom continues to have serious difficulties with BA-NY's help desks. Among other problems, MCI WorldCom has become concerned with the lack of communication between the BA-NY help desk attendants who take MCI WorldCom's calls and open trouble tickets and the BA-NY technicians who actually work the issues. For example, in recent discussions regarding the missing 997 acknowledgments, BA-NY's point of contact for the problem revealed that he was only aware of four of the fourteen trouble tickets that MCI WorldCom had opened on the issue. As a result of these experiences, MCI WorldCom has asked to eliminate help desk intervention altogether on the issue of the missing 997s. MCI WorldCom has requested direct contact between a BA-NY technician dedicated to the problem and a member of MCI WorldCom's information technology group. BA-NY has agreed to consider the approach.

B. Performance Measurements

With respect to the Commission's consideration of the NYPSC's November 3, 1999 adoption of BA-NY's Amended Performance Assurance Plan ("APAP") and Amended Change Control Assurance Plan ("ACCAP"),[5] MCI WorldCom notes that the NYPSC's order required very few changes to the APAP and ACCAP proposed by BA-NY on September 24, 1999, and discussed in BA-NY's Application and the Comments of many commenters.[6] The NYPSC

5/   See AT&T Motion To Strike at 6; BA-NY's Opposition to AT&T's Motion to Strike at 9.

6/   See, e.g., BA-NY Application at 74-79; MCI WorldCom Comments at 38-45.

approved the APAP and ACCAP despite the view of many CLECs, including MCI WorldCom, that the plans would not be effective in deterring discriminatory behavior by BA-NY.

A review of a few critical performance issues demonstrates that this concern remains valid. MCI WorldCom has consistently expressed its concerns about BA-NY's performance with respect to flow through, missing completion notices, and pre-order response times for parsed CSRs. See, e.g., MCI WorldCom Reply Comments, 4-11, 17-21. The APAP and ACCAP, as approved by the NYPSC, do nothing to assuage these concerns.

Flow through. Although the APAP contains a "special provision" concerning flow-through, the payments under these special provisions are triggered only if BA-NY fails to achieve the minimum percentage of flow through for both the total flow through (OR 5-01) and the achieved flow through (OR 5-03) metrics.[7] See APAP, app. H, p. 2. BA-NY's difficulties have been reflected in poor total flow through, resulting primarily from design flaws in its OSS. On the other hand, BA-NY is likely to score well on the achieved flow through metric – which measures orders that flow through that were designed to flow through. If this is the case, poor performance by BA-NY with respect to the total flow through metric – which measures the percentage of all orders flowing through – will never trigger a remedy.

Missing Completion Notices. As discussed above, missing NOCs remain one of the most critical problems with BA-NY's OSS. Yet the performance metrics established by the NYPSC do not address the issue of missing completion notices. Neither does the APAP. MCI WorldCom and other CLECs affected by BA-NY's missing completion notices are thus without a remedy under the performance remedy plans approved by the NYPSC.

_____

7/   The achieved flow through metric is still under development.

Parsed CSR Response Times. As explained in MCI WorldCom's Reply Comments, parsed CSRs are necessary for CLECs to process commercial volumes of orders. Moreover, at least until recently, BA-NY has consistently provided extremely slow response times for parsed CSRs. See MCI WorldCom Reply Comments, 17-19. BA-NY's performance in providing parsed CSRs is measured by metric OR 1-09 ("Parsed CSR"). But despite the significance of this metric to the viability of competition, the APAP does not monitor in any way BA-NY's provision of parsed CSRs.

These are but a few examples of the gaps in coverage provided by the APAP and ACCAP. The sum of the matter is that for many of the key barriers to competition identified by MCI WorldCom, the APAP and ACCAP provide no relief. By rejecting almost all CLEC suggestions for strengthening the APAP and ACCAP (including elimination of the aggregation of metrics and by incorporation of all needed metrics into the plans), the NYPSC passed up a critical opportunity to prevent BA-NY from backsliding on its market opening commitments.
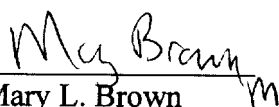
C. Conclusion

BA-NY's supplemental evidence only highlights the fact that its 271 application was premature when filed and that BA-NY still has work left if it is to support sustained competitive entry into the local markets in New York.

Respectfully submitted,

Mark D. Schneider   Mary L. Brown
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December 14, 1999

COMMENTS OF MCI WORLDCOM, INC.
ON THE POST-APPLICATION EVIDENCE
RELATING TO THE SECTION 271 APPLICATION BY
BELL ATLANTIC-NEW YORK

ATTACHMENT 1

MCI WorldCom Comments on
CLEC Change Management Notification Process

Listed below are MCI WorldCom's comments regarding the Draft CLEC Change Management Notification Process document released on October 25, 1999.

1. Section I. System Outages: Please clarify the difference between the following definition statements:

   - The System Outage Notification process will be used to communicate the following: "A Bell Atlantic system outage has occurred that is preventing the CLECs from performing Ordering, Pre-order, or Trouble Maintenance transaction through one of the production interfaces."

     And

     The System Outage Notification process does not apply to the following: "Issues with production software that may prohibit the CLECs from performing Ordering, Pre-order, or Trouble Maintenance transactions (see III. Type 1 Change Request Notification)."

2. Section III. Type 1 Change Request: Include the 'Objective' as described in the 6/24/98 TIS Change Management Type 1 Severity 1 Change Process document.

3. Include Root Cause and Resolution to process description (i.e. Entrance and Exit Criteria) where change request is marked "Final".

4. Include change control Escalation Procedure to the document.

5. Include an interval showing the internal Bell Atlantic technical bridge to the timeline and process description.

6. Include Bell Atlantic's internal Type 1 Severity 1 process as described in the 6/24/98 TIS Change Management Type 1 Severity 1 Change Process document.

7. Include recovery of lost orders process to the timeline and process description as described in the 6/24/98 TIS Change Management Type 1 Severity 1 Change Process document.

8. Include process problem investigation descriptions to timelines (i.e. Change Discovery, Change Isolation, Update, and Change Resolution) as described in the 6/24/98 TIS Change Management Type 1 Severity 1 Change Management Process document.

Additional comments regarding Bulletin Notifications sent via email that are still outstanding:

1. In the Subject Field add the report status, **Initial** or **Final**.

2. In the Subject Field differentiate between Trouble Ticket numbers and Change Request. Specifically, if a change request is generated as a problem resulting from multiple CLECs (or a single CLEC), BA should include the trouble tickets numbers assigned to the given CLECs to the bulletin. This will provide visibility to CLECs in tracking their trouble ticket.

3. System Impacted - Bell Atlantic should identify system impacts when their backend systems are not available. Specifically, what portion of the web GUI / backend system impacted during an outage. EDI will not work if the backend systems are down.

4. Provide estimated time for system recovery.

Comments on the Notification Process to date:

Although MCI WorldCom has noticed improvements in the process there are several items that still need attention.

There are a high volume of Type 1 Severity 1 bulletins and outages that are lacking one main item, Root Cause Analysis. MCI WorldCom believes that Bell Atlantic should not issue a Final notification of an outage until a true resolution is determined. For example, "Issue cleared by itself during investigation" is not sufficient. BA needs to provide Root Cause and Resolution for all outages with the industry notification. To date, MCI WorldCom has been forced to escalate when system outages that impact our systems have occurred without root causes being identified.

In addition, MCI WorldCom requests that Bell Atlantic provide a contact list for the Helpdesk when an issue needs to be resolved in a timely manner and to ensure that the bridge is a working bridge with the CLECs not a status bridge. In order for this process to truly work Bell Atlantic needs to provide as much detail on these calls as possible to ensure that there is no misunderstanding and confusion amongst the Bell Atlantic and the CLEC community.